

AS/SDNY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MORGAN FUNDING CORPORATION,	:	
Plaintiff,	:	Case No.: 07 Civ. 4073 (RMB)
v.	:	MOTION TO ADMIT COUNSEL
	:	<i>PRO HAC VICE</i>
MARIO H. FIGUEROA, et al.,	:	
Defendants	:	

2007-08-09 10:45 AM 00

PURSUANT TO RULE 1.3 (c) of the local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Shaffin A. Datoo, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

James E. Fagan, III
Venable LLP
575 7th Street, NW
Washington, DC 20004
Tel.: (202) 344-8041
Fax: (202) 344-8300

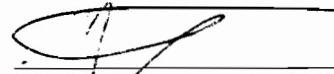
James E. Fagan, III is a member in good standing of the Bars of the Commonwealth of Virginia and the District of Columbia. There are no pending disciplinary proceedings against James E. Fagan, III in any State or Federal Court.

Dated: August 6, 2007
New York, New York

Respectfully submitted,

VENABLE LLP
405 Lexington Avenue, 62nd Floor
New York, NY 10174
(212) 307-5500

By:


Shaffin A. Datoo (SD-6929)

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Shaffin A. Datoo, hereby certify that on August 6, 2007, I caused a true and correct copy of the **Motion to Admit Counsel *Pro Hac Vice*** to be served via first class mail on Defendants as follows:

MARIO H. FIGUEROA
393 W. 49th Street
New York, NY 10019
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

ACZEL RICO
217 Hazen Ave, Apt 1E
New York, NY 10033
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JOHN BLOTT
2075 Bradford Ave. Apt 1G,
Brooklyn, NY 11226
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

DAMON CHAN
83-13 Dongan Ave.
Elmhurst, NY 11373
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JOHN LEONE
552 W. 163rd Street, Apt. 31
New York, NY 10032

CHRISTOPHER NAYLOR
10 Laurel Court
Highland Mills, NY 10930

CHRISTOPHER VAN DYKE
561 10th Ave.
New York, NY 10036
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

CARLOS VILLAR
50 West Buchanan Place, Apt. 1A
Bronx, NY 10453
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JAMES YIN
153 S. 74th Street
Brooklyn, NY 11228
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

BENJAMIN YIP
58-18 206th Street
Bayside, NY 11364

JONATHAN E. VERAS
420 W. 42nd Street, #24H
New York, NY 10036



SHAFFIN A. DATOO

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
MORGAN FUNDING CORPORATION, :
Plaintiff, : Case No.: 07 Civ. 4073 (RMB)
v. :
: **AFFIRMATION OF SHAFFIN A.**
: **DATOO IN SUPPORT OF MOTION TO**
: **ADMIT COUNSEL *PRO HAC VICE***
MARIO H. FIGUEROA, et al., :
Defendants. :
-----x

Shaffin A. Datoo, an attorney duly admitted to practice law in the State of New York and in the Southern District of New York, hereby affirms under penalties of perjury as follows:

1. I am an associate attorney at Venable LLP, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit James E. Fagan, III as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with the Court.
3. I have known James E. Fagan, III since January 2007.
4. James E. Fagan, III is an associated attorney at Venable LLP, in Washington, D.C. His office is located at 575 7th Street, N.W., Washington, DC 20004.
5. Certificates of good standing for James E. Fagan, III are attached hereto as **Exhibit A**.

6. I have found James E. Fagan, III to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
7. Accordingly, I am pleased to move for the admission of James E. Fagan, III, *pro hac vice*.
8. I respectfully submit a proposed order granting the admission of James E. Fagan, *pro hac vice*, which is attached hereto as **Exhibit B**.

WHEREFORE, it is respectfully requested that the motion to admit James E. Fagan, III *pro hac vice*, to represent Plaintiff in the above-captioned matter, be granted.

Dated: August 6, 2007
New York, New York



SHAFFIN A. DATOO (SD-6929)



Howard W. Martin, Jr., President
 Crenshaw, Ware & Martin, P.L.C.
 1200 Bank of America Center
 Norfolk, VA 23510-2111
 Telephone: (757) 623-3000

Manuel A. Capsalis, President-elect
 Capsalis, Bruce & Reaser, P.L.C.
 2200 Wilson Boulevard, Suite 800
 Arlington, VA 22201
 Telephone: (703) 358-9620

Karen A. Gould, Immediate Past President
 McSweeney, Crump, Childress & Gould, P.C.
 11 South Twelfth Street
 Richmond, VA 23219
 Telephone: (804) 545-2415

George W. Chabalewski
 Bar Counsel

Thomas A. Edmonds
 Executive Director and
 Chief Operating Officer

Mary Yancey Spencer
 Deputy Executive Director

Elizabeth L. Keller
 Assistant Executive Director
 for Bar Services

Susan C. Busch
 Assistant Executive Director
 for Administration

Virginia State Bar

Eighth and Main Building
 707 East Main Street, Suite 1500
 Richmond, Virginia 23219-2800
 Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

July 19, 2007

CERTIFICATE OF GOOD STANDING

**THIS IS TO CERTIFY THAT JAMES EDWARD FAGAN, III IS AN
 ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING.
 MR. FAGAN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON
 OCTOBER 1, 1992, AFTER SUCCESSFULLY PASSING THE BAR
 EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.**

SINCERELY,

A handwritten signature in black ink, appearing to read "Thomas A. Edmonds".

**THOMAS A. EDMONDS
 EXECUTIVE DIRECTOR AND
 CHIEF OPERATING OFFICER**



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JAMES EDWARD FAGAN

was on the 11TH day of DECEMBER, 2006

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 12, 2007.

GARLAND PINKSTON, JR., CLERK

By: G. Pinkston
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MORGAN FUNDING CORPORATION,	:	
	:	Case No.: 07 Civ. 4073 (RMB)
Plaintiff.	:	
	:	ORDER FOR ADMISSION OF
	:	COUNSEL <i>PRO HAC VICE</i>
v.	:	
MARIO H. FIGUEROA, et al..	:	
	:	
Defendants.	:	

Upon the Motion of Shaffin A. Datoo, attorney for Plaintiff, Morgan Funding Corp., and said sponsor attorney's affirmation in support;

IT IS HEREBY ORDERED that:

James E. Fagan, III
Venable LLP
575 7th Street, NW
Washington, DC 20004
Tel.: (202) 344-8041
Fax: (202) 344-8300
E-mail: jefagan@venable.com

is admitted to practice *pro hac vice* as counsel for Plaintiff, Morgan Funding Corp., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____, 2007
New York, New York

CERTIFICATE OF SERVICE

I, Shaffin A. Datoo, hereby certify that on August 6, 2007, I caused a true and correct copy of the **Affirmation of Shaffin A. Datoo In Support of Motion to Admit Counsel Pro Hac Vice** to be served via first class mail on Defendants as follows:

MARIO H. FIGUEROA
393 W. 49th Street
New York, NY 10019
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

ACZEL RICO
217 Hazen Ave, Apt 1E
New York, NY 10033
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JOHN BLOTT
2075 Bradford Ave. Apt 1G,
Brooklyn, NY 11226
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

DAMON CHAN
83-13 Dongan Ave.
Elmhurst, NY 11373
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JOHN LEONE
552 W. 163rd Street, Apt. 31
New York, NY 10032

CHRISTOPHER NAYLOR
10 Laurel Court
Highland Mills, NY 10930

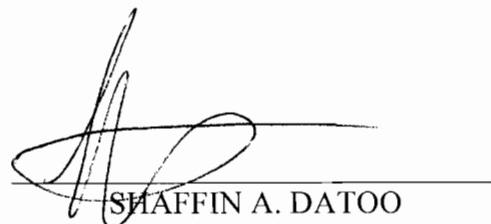
CHRISTOPHER VAN DYKE
561 10th Ave.
New York, NY 10036
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

CARLOS VILLAR
50 West Buchanan Place, Apt. 1A
Bronx, NY 10453
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

JAMES YIN
153 S. 74th Street
Brooklyn, NY 11228
and
c/o Robbins and Lloyd Mortgage
347 5th Avenue, Room 1506
New York, New York 10016

BENJAMIN YIP
58-18 206th Street
Bayside, NY 11364

JONATHAN E. VERAS
420 W. 42nd Street, #24H
New York, NY 10036



SHAFFIN A. DATOO